

REMARKS**Applicant addresses each item of the office action of 3/22/2002:**

1. The Examiner recites 35 U.S.C. 102(b) in support of the rejection of items 2 through 20.
2. The Examiner states that claims 1-18 are rejected under 35 U.S.C. 102(b) as being anticipated by Chelliah et al (5,710,887).

Applicant traverses this and other arguments of anticipation of the office action by reason that each and every claim element is not disclosed in Chelliah nor in the other cited references. Although claims 1-14 have been cancelled from the application, the applicant provides rebuttal arguments to preserve the right to claim those inventions in a continuing application.

3. It is alleged that Chelliah discloses an E-Commerce system comprising: a plurality of vendor commerce systems (col. 8, lines 18-34); a plurality of back-end processing systems for processing transaction requests generated by the plurality of vendor commerce systems (col. 28, lines 20-34); and a transaction processor coupled between the plurality of vendor commerce systems and the plurality of back-end processing systems (Fig. 1), wherein the transaction processor includes a global shopping basket for storing transaction information generated by the plurality of vendor commerce systems (col. 14, lines 63-67 and col. 15, lines 1-5), and a back-end processor interface for processing and routing the stored transaction requests to the plurality of back-end processing systems (Fig. 8).

The applicant traverses this rejection on the grounds that at least a global shopping basket is not disclosed by Chelliah nor the other cited references. The reference at col. 14 line 63 proceeding through col. 15 line 5 appears to disclose shopping baskets, but not global shopping baskets capable of storing selections from more than one vendor. The rejection arguments are therefore

insufficient to make a showing of anticipation of Claim 1.

4. Claim 2 is rejected on the allegation that Chelliah teaches an E-Commerce portal coupled to the plurality of vendor commerce systems.

Applicant traverses this rejection on the same grounds as claim 1. The arguments for rejection of Claim 4 are therefore not supported by the citations.

5. Claim 3 is rejected on the allegation that Chelliah teaches wherein the plurality of vendor commerce systems include: a local catalog of products and a local shopping basket, and further that Chelliah teaches a catalog and shopping cart (col. 26, lines 35-53) and the ability to create combinations to internalize or externalize the process based on the customer's needs (col. 28, lines 20-34), leading to the conclusion that the catalog and shopping basket "cart" can be located at the vendor's commerce system if desired.

Applicant traverses this rejection on the same grounds as claim 1. Additionally, Chelliah does not teach the use of both local shopping carts and global shopping carts, nor does that reference teach any interposing objects or interaction. The reference at col. 26, lines 35-53 describes an "Enter__Location" event and other events and does not appear to disclose shopping carts. At col. 28, lines 20-34 provides a summary description of an electronic mall according to Chelliah, and does not appear to disclose the creation of combinations to internalize or externalize the process. Claim 4 is therefore not anticipated by Chelliah.

6. Claim 4 is rejected on the allegation that Chelliah teaches wherein the plurality of vendor commerce systems further include: a local customer directory and local workflow rules, and further that Chelliah teaches a directory and workflow rules and the ability to create combinations to internalize or externalize the process based on the customer's needs, leading to the conclusion that the directory and local workflow rules can be located at the vendor's

commerce system if desired.

Applicant traverses this rejection on the same grounds as claims 1 and 3. Claim 4 is therefore not anticipated by Chelliah.

7. Claim 5 is rejected on the allegation that Chelliah teaches a transaction interface implemented at the plurality of vendor commerce systems and at the transaction processor, wherein the transaction interface generates a transaction packet having a predefined format each time a customer using the E-Commerce system purchases a product at one of the vendor commerce systems, the transaction packet being transmitted from the vendor commerce system where the purchase is made by the customer to the transaction processor, where it is stored in the global basket.

Applicant traverses this rejection on the same grounds as claim 1. The arguments for rejection of Claim 5 are therefore not supported by the citations.

8. Claim 6 is rejected on allegations that Chelliah teaches wherein the format of the transaction packet includes: an order header including: customer authentication information; merchant authentication information; a time stamp; and one or more order entry items.

Applicant traverses this rejection on the same grounds as claims 1 and 5, and further that a transaction packet including an order header with the specific elements of (1) customer authentication information, (2) merchant authentication information, (3) a time stamp, and (4) one or more order entry items is also not disclosed. Claim 6 is therefore not anticipated by Chelliah.

9. Claim 7 is rejected on allegations that Chelliah teaches wherein the vendor commerce systems are coupled to the transaction processor via the Internet.

Applicant traverses this rejection on the same grounds as claim 1. The arguments for rejection of Claim 7 are therefore not supported by the citations.

10. Claim 8 is rejected on allegations that Chelliah teaches wherein the back-end processing systems include a plurality of payment verification systems (col. 3, lines 66,67 and col. 4 lines 1-15).

Applicant traverses this rejection on the same grounds as claim 1. Furthermore, neither Chelliah nor other cited references disclose a plurality of payment verification systems. Chelliah starting at col. 3, lines 66-67 states: "To arrange payment for any transaction , the system of the invention further comprises a payment handler ... " The citation does not speak of more than one payment handler. Claim 8 is therefore not anticipated by Chelliah.

11. Claim 9 is rejected with allegations that Chelliah teaches wherein the back-end processing systems include: a plurality of payment verification systems; an accounting/billing system; and one or more order fulfillment systems.

Applicant traverses this rejection on the same grounds as claim 1. The arguments for rejection of Claim 9 are therefore not supported by the citations.

12. Claim 10 is rejected with allegations that Chelliah teaches a payment proxy system coupled between the transaction processor and the plurality of payment verification systems.

Applicant traverses this rejection on the same grounds as claims 1 and 8. Claim 10 is therefore not anticipated by Chelliah.

13. Claim 11 is rejected with allegations that Chelliah teaches a merchant database and a

transaction capture database coupled to the payment proxy system, wherein the merchant database stores merchant-specific payment verification rules, and the transaction capture database stores information regarding the transactions verified via the payment proxy system.

Applicant traverses this rejection on the same grounds as claims 1, 8 and 10. Furthermore, neither Chelliah nor the other cited references disclose a merchant database storing merchant-specific payment verification rules. Claim 11 is therefore not anticipated by Chelliah.

14. Claim 12 is rejected with allegations that Chelliah teaches a customer database coupled to the transaction processor (abstract), wherein the customer database stores customer-specific transaction processing rules that instruct the transaction processor how to process a transaction for a particular customer; and a merchant database coupled to the transaction processor, wherein the merchant database stores merchant-specific transaction processing rules that instruct the transaction processor how to process a transaction for a particular merchant.

Applicant traverses this rejection on the same grounds as claim 1, and further that neither Chelliah nor the other cited references disclose a merchant database storing merchant-specific transaction processing rules that instruct the transaction processor how to process a transaction for a particular merchant. Claim 12 is therefore not anticipated by Chelliah.

15. Claim 13 is rejected with allegations that Chelliah teaches wherein one of the customer database or merchant database(s) include runtime scripting information for determining, in real-time, how to process a particular transaction generated by a particular customer or merchant.

Applicant traverses this rejection on the same grounds as claims 1 and 12. Claim 13 is therefore not anticipated by Chelliah.

16. Claim 14 is rejected with allegations that Chelliah teaches wherein the payment proxy

system includes: a payment proxy interface for communicating information to and from the transaction processor; runtime payment logic for determining, in real-time, how to process a particular transaction request transmitted to the payment proxy from the transaction processor; and an plurality of payment connection modules coupled to the runtime payment logic for interfacing the transaction request to one of a plurality of payment verification systems.

Applicant traverses this rejection on the same grounds as claims 1, 8 and 10. Claim 14 is therefore not anticipated by Chelliah.

17. Claim 15 is rejected with allegations that Chelliah discloses a method of conducting E-Commerce, comprising the steps of: (A) connecting to an E-Commerce portal; (B) linking from the E-Commerce portal to a vendor commerce system associated with the E-Commerce portal; (C) browsing a local catalog of products stored at the vendor commerce system and selecting a particular product for purchase; (D) transmitting a transaction packet from the vendor commerce system to a common transaction processing system via the Internet, and storing the transaction packet in a global shopping basket; (E) returning to step (A) and repeating steps (B), (C) and (D) until no additional products are to be purchased; (F) segmenting the transaction packet information stored in the global shopping basket and aggregating individual product order items by vendor (col. 27, lines 51-59); (G) processing the individual product order items for each vendor at the transaction processing system by communicating transaction information between the transaction processing system and a plurality of back-end processing systems.

The applicant traverses this rejection on the grounds that at least (F) segmenting the transaction packet information stored in the global shopping basket and aggregating individual product order items is not disclosed by Chelliah nor the other cited references. The reference at col. 27 lines 51-59 discloses a "Sales Representative Program Object for Multiple Stores" and "maintain(ing) a list of all items selected by the customer", but does not teach nor enable the processing of such a list to fulfill an order. Claim 15 is therefore not anticipated by Chelliah.

18. Claim 16 is rejected with allegations that Chelliah teaches wherein the processing step (G) further comprises the steps of: (G)(1) querying a vendor database to obtain vendor specific processing rules used by the transaction processing system to process the transaction order items for a particular vendor (col. 15, lines 6-23); and (G)(2) querying a customer database to obtain customer-specific processing rules used by the transaction processing system to process the transaction order items for a particular customer (col. 4, lines 49-59).

The applicant traverses this rejection on the same grounds as claim 15 in that at least (F) segmenting the transaction packet information stored in the global shopping basket and aggregating individual product order items is not disclosed by Chelliah nor the other cited references. Furthermore, neither Chelliah nor the other cited references disclose the use of a vendor database or a customer database containing processing rules. The reference at col. 15 lines 6-23 speaks of “pricing rules” for coupons, but not vendor specific processing rules usable to process transaction order items for a particular vendor. The reference at col. 4 lines 49-59 speaks of a “customer information database” containing “customer specific information” electronically representing a customer to a “customer monitoring object”, the included information preferably relating to the forms of payment available to customers. That reference does not teach a database containing rules used by a transaction processing system to process transaction order items. Claim 16 is therefore not anticipated by Chelliah.

19. Claim 17 is rejected with allegations that Chelliah discloses a payment proxy system for use with an online transaction processor, comprising: a payment proxy interface for communicating information to and from the transaction processor; runtime payment logic for determining, in real-time, how to process a particular transaction request transmitted to the payment proxy from the transaction processor; and a plurality of payment connection modules coupled to the runtime payment logic for interfacing the transaction request to one of a plurality of payment verification systems.

The applicant traverses this rejection on the grounds that (1) a payment proxy interface, (2) payment connection modules, and (3) a plurality of payment verification systems are not disclosed by Chelliah nor by the other cited references. The reference from col. 15, line 43 to col. 17, line 45 speaks of a "Sales Representative Program Object" that communicates with a "Participant Program Object" to obtain a list of methods of payment available to a customer, and a "Payment Handler Interface" that communicates with an "External Payment Handler" to authorize a charge to a credit card account. That reference does not disclose a payment proxy interface for communicating with the transaction processor, as a participant program object serves a different purpose than a transaction processor and should not be equated. Additionally, the payment handler interface of Chellia appears to be monolithic rather than modular, i.e. the disclosed payment handler interface does not contain "payment connection modules". Chelliah additionally does not teach a plurality of payment verification systems nor the use thereof. Claim 17 is therefore not anticipated by Chelliah.

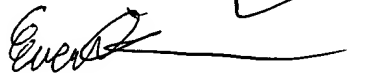
20. Claim 18 is rejected with allegations that Chelliah discloses an E-Commerce framework, comprising: a plurality of vendor commerce systems linked to a common E-Commerce portal, wherein each vendor commerce system includes a local product catalog and a local shopping basket; a transaction processor linked to the E-Commerce portal via a computer network, the transaction processor having a global shopping basket and an interface for communicating transaction information between the local shopping baskets of the vendor commerce systems and the global shopping basket of the transaction processor; a plurality of payment verification systems for authenticating transaction requests generated by the transaction processor when a customer of the framework engages a global checkout function; and a payment proxy system coupled between the transaction processor and the plurality of payment verification systems for transmitting transaction requests generated by the transaction processor to the appropriate payment verification system.

The applicant traverses this rejection on the grounds that at least the use of both local shopping carts and global shopping carts is not taught by Chelliah, nor does that reference teach any interposing objects or interaction, such as a transaction processor. Chelliah additionally does not teach a plurality of payment verification systems nor the use thereof. Claim 18 is therefore not anticipated by Chelliah.

We acknowledge receipt of the contact information of the examiner. The effort, reasonability and cooperation of the examiner in this application are appreciated.

Applicant presents the above arguments of rebuttal, those arguments supporting our belief that the claims as originally filed remain allowable even in light of the Examiner's arguments and cited references. Nevertheless, for the purpose of advancing the application to allowance, applicant has amended the claims, those amendments either providing clarification, rendering explicit what was implicit or correcting grammatical and spelling errors in the originally filed claims.

Respectfully submitted this 20 day of June, 2003.



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